

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 656

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' FIRST OMNIBUS
MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE REJECTION OF
CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES EFFECTIVE
AS OF DATES SPECIFIED HEREIN AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”) hereby certifies as follows:

1. On November 1, 2023 the Debtors filed the *Debtors’ First Omnibus Motion for Entry of an Order (I) Authorizing the Rejection of Certain Executory Contracts and Unexpired Leases Effective as of Dates Specified Herein and (II) Granting Related Relief* [Docket No. 656] (the “**Motion**”). Attached to the Motion was, among other things, a proposed form of order approving the relief requested in the Motion (the “**Proposed Order**”).

2. Pursuant to the notice filed with the Motion, any objection or response to the relief requested in the Motion was to be filed and served so as to be received no later than **November 14, 2023 at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”). The undersigned further certifies that they have reviewed the Court’s docket in these cases and no answer, objection, or other responsive pleading to the Motion appears thereon.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

3. Attached hereto as **Exhibit A** is a revised proposed form of order incorporating the changes to **Schedule 1** (the “Revised Proposed Order”) to remove certain contracts that the Debtors are not rejecting at this time. For the convenience of the Court and all parties in interest, a blackline of the revisions to **Schedule 1** is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors respectfully request that the Revised Proposed Order be entered at the earliest convenience of the Court.

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Dated: November 16, 2023
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u> WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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